

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA**

In re	)	
	)	
Stacie Irene Spence	)	CASE NO. 14-11752 NLJ
	)	CHAPTER 13
Debtor	)	

**OBJECTION TO MOTION TO DISMISS,  
MOTION TO MODIFY CONFIRMED PLAN,  
REQUEST FOR COMPENSATION OF ATTORNEYS FEES,  
BRIEF IN SUPPORT  
AND NOTICE OF OPPORTUNITY FOR HEARING**

COMES NOW Debtor, Stacie Irene Spence, and objects to the Motion to Dismiss of the Chapter 13 Trustee, and Moves the Court for an order modifying the chapter 13 plan confirmed by the court on July 25, 2014 and in support thereof, states as follows:

1. On April 25, 2014, the Debtor filed a Petition under Chapter 13 of the Bankruptcy Code.
2. On July 25, 2014, this Court entered its Order Confirming Plan.
3. Debtor moves to modify the Chapter 13 Plan, to wit:
  - a. The Debtor be treated as current through September, 2014.
  - b. Payments to be \$659.00 per month beginning October, 2014 and for the remainder of the plan.
  - c. To provide that counsel for Debtor receive \$500.00 for post-confirmation services rendered in this matter to be paid pursuant to the Local Guidelines concerning post-confirmation services, and without the necessity of filing an application for the same.
4. The modification is necessary to make the plan feasible and to allow for the proper payment of the proof of claim filed by the OKLAHOMA TAX COMMISSION.

WHEREFORE, premises considered, Debtor respectfully requests this Court issue an Order Modifying Debtor's Chapter 13 Plan. Further, Debtor's attorney requests that she be compensated as requested.

Respectfully submitted,

/s Tearsa Storms Olson

Tearsa Storms Olson OBA#30264  
Storms Law Office, PC  
2400 NW 23<sup>rd</sup> St., Suite 102  
Oklahoma City, OK 73107  
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Email: [tearsastorms@gmail.com](mailto:tearsastorms@gmail.com)  
Attorney for Debtor

**NOTICE OF OPPORTUNITY FOR HEARING**

**Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document.** If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than twenty-one (21) days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

**The 21 day period includes the three (3) days allowed for mailing provided in Bankruptcy Rule 9006(f).**

**CERTIFICATE OF SERVICE**

This is to certify that on the **19th** day of **September, 2014**, a true and correct copy of the **Objection to Motion to Dismiss, Motion to Modify Confirmed Plan, Request for Compensation of Attorneys Fees, Brief in Support and Notice of Opportunity for Hearing** [Document No. 24] filed on the **19th** day of **September, 2014** was forwarded via U.S. Mail, first class, postage prepaid, to the following:

All creditors on the attached mailing matrix.

/s/ Tearsa Storms Olson  
Tearsa Storms Olson, OBA# 30265

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Label Matrix for local noticing  
1087-5  
Case 14-11752  
Western District of Oklahoma  
Oklahoma City  
Fri Sep 19 18:32:01 CDT 2014

USBC Western District of Oklahoma  
215 Dean A. McGee  
Oklahoma City, OK 73102-3426

AMCOL Systems, Inc.  
Amcol Systems, Inc.  
Po Box 21625  
Columbia SC 29221-1625

Accident and Trauma Center  
PO Box 722290  
Norman OK 73070-8731

All American Fitness and Racquetball  
Millennium Financial Group  
5770 NW Expressway Suite 102  
Oklahoma City OK 73132-5238

American InfoSource LP as agent for  
Integris Health  
PO Box 248838  
Oklahoma City, OK 73124-8838

American InfoSource LP as agent for  
T Mobile/T-Mobile USA Inc  
PO Box 248848  
Oklahoma City, OK 73124-8848

Ars /Account Resolution Services  
1801 Nw 66th Ave Ste 200  
Plantation FL 33313-4571

Atlas Acquisitions LLC  
294 Union St.  
Hackensack, NJ 07601-4303

Auto Advantage Finance, Inc.  
5350 S. Western Ave., 4th Floor  
Oklahoma City, OK 73109-4520

BancFirst  
1213 Gordon Cooper Drive  
Tecumseh OK 74873-1460

Bancfirst  
Po Box 26788  
Oklahoma City OK 73126-0788

Caine & Weiner  
Po Box 5010  
Woodland Hills CA 91365-5010

Cbe Group  
131 Tower Park Dri  
Waterloo IA 50701-9374

Central OK Chiropractic Clinic  
602 N Broadway  
Tecumseh OK 74873-2020

Cer Sts Rec  
1314 N Main St  
Hutchinson KS 67501-4002

Classen Urgent Care  
419 W Gray Street  
Norman OK 73069-7117

Community Hospital Outpatient Therapy  
1001 S Western Ave  
Oklahoma City OK 73139

Conn Appliances, Inc. as Attorney-in-Fact an  
P.O. Box 2358  
Beaumont, Texas 77704-2358

Conns  
Box 2358  
Beaumont TX 77704-2358

Covington Credit  
627 NW 7th Street  
Oklahoma City OK 73160-3803

Covington Credit Inc #OK0018  
Southern Management Corporation  
PO Box 1947  
Greenville SC 29602-1947

Crdt Ctrl Co  
11821 Rock Landing Dr  
Newport News VA 23606-4207

Credit Collections Inc/AMR  
Po Box 60607  
Oklahoma City OK 73146-0607

Credit Servi  
Pob 60566  
Oklahoma City OK 73146-0566

Dept of Education  
FedLoan Servicing  
PO Box 69184  
Harrisburg PA 17106-9184

Direct Advertising Consultatns  
PO Box 1369  
Washington MO 63090-8369

EMSA  
1111 Classen Drive  
Oklahoma City OK 73103-2607

Empire Finan  
102 W Main St  
Purcell OK 73080-4220

Enhanced Recovery Corp  
Attention: Client Services  
8014 Bayberry Rd  
Jacksonville FL 32256-7412

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Exp Cr Auto  
4000 N May  
Oklahoma City OK 73112-6269

HSN Flexpay Dept  
PO Box 9090  
Clearwater FL 33758-9090

IC System  
Attn: Bankruptcy  
444 Highway 96 East; Po Box 64378  
St. Paul MN 55164-0378

Integris ER Physicians  
PO Box 48305  
Jacksonville FL 32247-8305

Integris Health Baptist  
PO Box 268907  
Oklahoma City OK 73126-8907

Internal Revenue Service  
PO Box 7346  
Philadelphia PA 19101-7346

Internal Revenue Service - OKC  
Mailstop 5024 OKC  
55 N Robinson  
Oklahoma City OK 73102-9229

Jefferson Capital Systems LLC  
Po Box 7999  
Saint Cloud Mn 56302-7999

Kankin and Woods Chiropractic  
828 Wall Street  
Norman OK 73069-6302

Mercy Clinic  
PO Box 2580-OK  
Springfield MO 65801

Mercy Health Systems  
1730 E Portland  
Springfield MO 65804-1311

Mercy Hospital  
4300 W Memorial Rd  
Oklahoma City OK 73120-8304

Mercy Physicians  
4300 W Memorial Rd  
Oklahoma City OK 73120-8304

Millenium  
5770 Nw Expressway Ste 1  
Warr Acres OK 73132-5241

National Credit Adjusters  
PO Box 3023  
Hutchinson KS 67504-3023

OKLAHOMA TAX COMMISSION  
General Counsel's Office  
120 N. Robinson, Ste 2000W  
Oklahoma City, OK 73102-7801

Oklahoma Sports Science and Ortho  
3110 SW 89, Suite 102  
Oklahoma City OK 73159-7919

(p)OKLAHOMA TAX COMMISSION  
120 N ROBINSON  
STE 2000W  
OKLAHOMA CITY OK 73102-7801

Oklahoma Unemployment Commission  
PO Box 52004  
Oklahoma City OK 73152-2004

Pottawatomie Telephone Company  
PO Box 66  
Earlsboro OK 74840-0066

React Emergency  
2316 N Airport Drive  
Shawnee OK 74804-2624

Security Fin  
C/o Security Finan  
Spartanburg SC 29304

Shawnee NewsStar  
215 N Bell  
Shawnee OK 74801-6982

Southwest Regional Imaging and Radiology  
3209 NW Expressway  
Oklahoma City OK 73112-4131

Southwestern Bell Telephone Company  
% AT&T Services, Inc  
Karen Cavagnaro, Paralegal  
One AT&T Way, Room 3A104  
Bedminster, NJ 07921-2693

Stapleton Law  
PO Box 720981  
Norman OK 73070-4759

Steven Richards  
PO Box 36-0119  
Oklahoma City OK 73196-0001

Tab Services  
PO Box 52039  
Tulsa OK 74152-0039

Thai An Doan DDS PC  
11318 N May Ave Ste B  
Oklahoma City OK 73120-5843

U.S. Trustee  
United States Trustee  
215 Dean A. McGee Ave., 4th Floor  
Oklahoma City, OK 73102-3444

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Unity  
1900 Gordon Cooper Drive  
Shawnee OK 74801-8603

Valarity Llc  
P O Box 505023  
Saint Louis MO 63150-5023

Webbnk/fstr  
6250 Ridgewood Rd  
Saint Cloud MN 56303-0820

cox communications  
po box 470800  
tulsa, OK 74147-0800

John T. Hardeman  
PO Box 1948  
Oklahoma City, OK 73101-1948

(c) STACIE IRENE SPENCE  
5475 156TH ST  
NOBLE OK 73068-6723

Tearsa Storms Olson  
Storms Law Office  
2400 NW 23rd St., Ste. 102  
Oklahoma City, OK 73107-2438

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Oklahoma Tax Commission  
Bankruptcy Section  
General Counsel  
Box 53248  
Oklahoma City OK 73152-3248

Addresses marked (c) above for the following entity/entities were corrected  
as required by the USPS Locatable Address Conversion System (LACS).

Stacie Irene Spence  
5475 SE 156th  
Noble, OK 73068

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Auto Advantage Finance, Inc.

End of Label Matrix	
Mailable recipients	66
Bypassed recipients	1
Total	67